

EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMAS A. EAMES, ROBERTA L. EAMES)
and TAMMY EAMES, on behalf of)
themselves and all others)
similary situated,)
)
Plaintiffs,)
) Civil Action
v.) No. 04-CV-1324KAJ
)
NATIONWIDE MUTUAL INSURANCE)
COMPANY,)
)
Defendant.)

Deposition of Glenn Deaton Agency, Inc.
taken pursuant to Federal Rule of Civil Procedure
30(b)(6) through its designee GLENN W. DEATON at the
law offices of Murphy, Spadaro & Landon, 1011 Centre
Road, Suite 210, Wilmington, Delaware, beginning at
10:40 a.m., on Tuesday, August 9, 2005, before Kurt A.
Fetzer, Registered Diplomate Reporter and Notary
Public.

APPEARANCES:

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10/10/05

1 A. Yes.

2 Q. And in the middle column it says full.

3 Do you see that?

4 A. Yes.

5 Q. And that's a characterization that we see in --

6 I'll represent to you that that characterization of
7 PIP as full is one that can be found in every set of
8 documents that the Deaton Agency produced.

9 Do you understand what I am representing
10 to you?

11 A. Yes.

12 Q. Does that surprise you?

13 A. No.

14 Q. Is it fair to say that the characterization of
15 PIP as full in documents like the auto rate quote
16 shown on the last page of Deaton 2 is a routine one in
17 your business?

18 A. Yes.

19 Q. What I could do is show you some additional
20 examples of that characterization as it appears in
21 other sets of documents that Deaton produced simply so
22 you could confirm that full is in there. We can go
23 through that exercise. I'm happy to do that. Or you
24 could simply tell me that you expect to find it in all

